

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re C.H. Robinson Worldwide, Inc.,)	CASE NO. 07-MD-01849
)	(JNE)
Overtime Pay Litigation)	
)	
)	
)	

**STIPULATION TO CONSOLIDATE *JOHNSON, ET AL. V. C.H. ROBINSON
WORLDWIDE, INC.*, CASE NO. 02-CV-4261,
IN MDL PROCEEDINGS FOR PURPOSES OF SETTLEMENT**

WHEREAS plaintiffs Trever Johnson, Jay Hicks, Kevin McGee, Casey Wilson, William Mackiewicz and Michael Dawson originally asserted their claims against defendant C.H. Robinson Worldwide, Inc. in *Johnson, et al. v. C.H. Robinson Worldwide, Inc.*, a collective action in the United States District Court for the District of Minnesota, Civil File No. 02-CV-4261;

WHEREAS on July 12, 2007, the Judicial Panel on Multidistrict Litigation (“JPML”) ordered that the 102¹ FLSA lawsuits against Defendant be consolidated in this Court for purposes of approving the Parties’ Agreements. A copy of the JPML’s Order consolidating these cases is attached to the accompanying Renewed Joint Motion as Exhibit 2 (Docket No. 43-1);

¹ While the JPML's order encompassed 100 cases, it also designated two others as potential “tag-along” cases under the JPML's rules. Pursuant to those rules, the parties have jointly asked the court to transfer these two cases to this Court in addition to the 100 cases encompassed in the order.

WHEREAS the *Johnson* matter was not consolidated as part of the MDL litigation captioned above;

WHEREAS all six of the Johnson named plaintiffs have agreed to resolve their claims as part of the overall proposed settlement and have signed settlement agreements and releases which have been provided to C.H. Robinson by their counsel, Mansfield, Tanick & Cohen, P.A. See, Declaration of Lawrence P. Schaefer dated January 18, 2008 (Docket No. 43-6).

WHEREAS the parties stipulate and agree that the *Johnson* matter should be consolidated with the MDL proceedings for purposes of the proposed overall settlement.

NOW THEREFORE, the parties hereby stipulate and agree that the *Johnson* matter, Civil No. 02-CV-4261, be consolidated and included in the above-entitled MDL case for purposes of the proposed overall settlement, including the settlement of the six named plaintiffs in the *Johnson* matter.

Dated: January 18, 2008

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